

REMARKS/ARGUMENTS

Status of the Application

Prior to entry of this Amendment, claims 1-3, 5, 8-13, 16-19, 21, and 23-25 were pending for examination. An Office Action mailed October 21, 2009 rejected claims 1-3, 5, 8-13, 16-19, 21, and 23-25 under 35 U.S.C. § 103(a) as being unpatentable over the combination of U.S. Patent No. 6,717,593 to Jennings (hereinafter "Jennings"), U.S. Patent Pub. No. 2002/0104068 of Barrett et al. (hereinafter "Barrett"), *Compilers: Principles, Techniques, and Tools* by Aho et al. (hereinafter "Aho"), and U.S. Patent No. 5,933,140 to Strahorn et al. (hereinafter "Strahorn").

This amendment amends claims 1 and 19, and adds new claims 28 and 29. No claims have been canceled. Hence, after entry of this amendment, claims 1-3, 5, 8-13, 16-19, 21, 23-25, 28, and 29 will stand pending for examination. Claims 1 and 19 are independent claims. The applicant respectfully requests reconsideration of the pending claims, for at least the reasons presented below.

Interview Summary

Undersigned counsel thanks the Examiner for the courtesy of conducting a telephonic interview with the undersigned on November 5, 2009, and for the professionalism shown by the Examiner throughout that interview. During the interview, the parties discussed the amendments reflected by this paper, and undersigned counsel explained how the claims, especially as amended, are distinct from the proposed combination of Jennings, Barrett, Aho, and Strahorn.

Claim Amendments

Claim 1 has been amended to recite, "receiving, from a server and at a client computer system, a web based application for display in a web browser . . ." (emphasis indicates amendment). Claim 1 has been further amended to recite, "automatically generating a parser

computer program at the client computer system, based on a defined grammar . . .," and "outputting, from the parser computer program at the client computer system to a context-based help utility at the client computer system . . ." (emphasis indicates amendments). Claim 1 has also been amended to remove the phrase "receiving a predefined grammar for the web-based application," and otherwise for consistency with this modification. Claim 19 has been amended in similar fashion. Support for these amendments can be found throughout the application, including specifically Fig. 1 and page 8.

Claim 1 has also been amended to remove extraneous language from the preamble, and the preamble of claim 19 has been amended to provide antecedent basis for the term "client computer system."

In addition, new claims 28 and 29 have been added. Claim 28 recites, inter alia, "analyzing the web-based application at the client computer system," and "defining the application-specific grammar at the client computer system, based on analysis of the web-based grammar." Support for this amendment can be found throughout the application, including, inter alia, at Fig. 2 and page 9. Claim 29 recites similar elements.

35 U.S.C. §103 Rejection – Claims 1-3, 5, 8-13, 16-19, 21, and 23-25

The Office Action has rejected claims 1-3, 5, 8-13, 16-19, 21, and 23-25 under 35 U.S.C. § 103(a) as being unpatentable over Jennings, in view of Barrett, in view of Aho. It is respectfully submitted that the claims, at least as amended, are allowable over any combination of Jennings, Barrett, and/or Aho.

For example, claim 1 recites, as amended, "automatically generating a parser computer program at the client computer system, based on the predefined grammar using an automated parser generator tool," "outputting, from the parser computer program at the client computer system to a context-based help utility at the client computer system, information about position and content of the at least one graphical element identified by parsing the tokens in the web-based application," and "providing context-based help based at least in part on the at least one graphical element in the web based application." It is respectfully submitted that the combination of Jennings with Barrett, Aho and Strahorn fails to teach or suggest these elements.

The Office Action concedes that neither Jennings, Barrett, nor Aho provides any teaching with respect to a context-based help utility. *See* Office Action at 7. The Office Action correctly notes, however, that Strahorn does teach the concept of context-based help for a web page. Strahorn's technique for doing so, however, varies significantly from that recited by claim 1.

For example, as the parties discussed in the interview, Strahorn introduces the idea of downloading, from a server, a helper utility that provides a "depiction" of a web page; this depiction is used to provide context-sensitive help. More specifically, "[w]hen the user selects **a section of depiction 320**, for example, using a mouse, program 312 retrieves help information from server 102." Strahorn, col. 4, ll. 38-42 (emphasis added). Hence, it is respectfully submitted that the Office Action is incorrect in asserting that "Strahorn provides help information based not only on information from a server, but also based upon the context related to a graphical selection," Office Action, at 2-3, at least insofar as the Office Action implies that the "graphical selection" is from a web page that has been parsed and tokenized. Instead, what the cited section of Strahorn teaches is that the context-based help is based not on anything on the web page, but instead on a selection from a wholly-separate depiction of the web page.

Indeed, Strahorn discloses that the "depiction" is not even a web page, but instead a static image: "Miniaturized depiction 320 is preferably not a Web page per se, but merely a rasterized depiction of the active Web page." Strahorn, col. 4, ll. 33-35. Accordingly, Strahorn cannot be read as disclosing "providing context-based help based at least in part on the at least one graphical element in the web-based application," as required by claim 1. Because, as the Office Action correctly concedes, none of the other cited references disclose this element, claim 1 is allowable over the cited references for at least this reason.

Claim 19 recites elements similar to those of claim 1 and is allowable over the applied references for at least similar reasons. Claims 2, 3, 5, 8-13, 16-18, 21, and 23-25 all ultimately depend from either claim 1 or claim 19 and are believed to be allowable at least by virtue of this dependence.

New Claims

New claims 28 and 29 have been added. Claim 28 depends from claim 1, and it recites "analyzing the web-based application at the client computer system, and "defining the application-specific grammar at the client computer system, based on analysis of the web-based grammar." Claim 29 depends from claim 19 and recites similar elements. It is respectfully submitted that claims 28 and 29 are allowable over the combination of Jennings, Barrett, Aho, and Strahorn, independent of the allowability of the claims from which they depend.

Merely by way of example, the Office Action relies on Jennings as teaching the concept of receiving a predefined grammar and a parser computer program that scans the DOM, and asserts that Jennings "also implies grammars for particular applications." Office Action, at 5-6. The Office Action concedes that Jennings does not teach the generation of a parser computer program but asserts that Aho provides such disclosure. *See* Office Action at 5-6.

Assuming, without conceding, that the Office Action is correct in this regard, it is respectfully submitted that nothing in Jennings, Aho, or their combination teaches or suggests analyzing a web-based application and defining an application-specific grammar based on analysis of the web-based application. On the one hand, the Office Action interprets XML as the grammar that is employed by Jennings in parsing a web page and notes that "a predefined grammar is inherent in such parsing, otherwise the parser would not . . . be able to recognize an XML element." Office Action at 5. Clearly, if XML is the grammar used by Jennings' parser, that grammar is not defined at the client based on analysis of a web-based application.

On the other hand, the Office Action does point to column 2, lines 53-57 as supporting the idea that Jennings might disclose application-specific grammars. Assuming this is true, these "application-specific grammars" must be based on description documents that define user interfaces for various devices (*see* Jennings, col. 2, ll. 53-54), not a web-based application itself. Neither the XML disclosed by Jennings nor the description documents discloses defining an application-specific grammar based on analysis of a web-based application.

For its part, Aho's parser generator also does not appear to be capable of defining an application-specific grammar based on analysis of a web-based application. Instead, as the

Office Action notes, Aho requires a pre-defined grammar as an input to the parser generator. See Office Action, at 5 ("Aho teaches the well known method of using a parser generator tool to automatically generate a parser based on a **predefined** grammar." (emphasis added)).

Hence, neither Aho nor Jennings teaches the elements of claim 28. Nor do any of the other references appear to be relevant in this regard. Accordingly, claim 28 (and, likewise, claim 29) is believed to be allowable over the cited combination for at least this additional reason.

CONCLUSION

In view of the foregoing, Applicants believe all claims now pending in this Application are in condition for allowance and an action to that end is respectfully requested.

If the Examiner believes a telephone conference would expedite prosecution of this application, please telephone the undersigned at 303-571-4000.

Respectfully submitted,

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